



Neil L. Postrygacz

June 28, 2022

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The Honorable Valerie E. Caproni
United States Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: SingularDTV GmbH v. LeBeau, et al
Civ. Action No. 1: 21-cv-10130

Dear Judge Caproni:

I represent the Defendant Zachary LeBeau in the above referenced action and write this letter in brief response to Plaintiff's letter dated June 24, 2022.

Mr. LeBeau has testified there is no device and the seed phrase is no longer functional. Further, Mr. LeBeau no longer practices the memorization techniques needed to memorize the seed phrase (since January 2022).

Kobre Kim has acknowledged that it can transfer any remaining digital assets from the cold wallet. It appears as if Kobre Kim has used the excuse of this transfer of any remaining assets from the cold wallet being "administratively burdensome" to continue to harass Mr. LeBeau. Kobre Kim could have taken the following easy steps, by way of example, to effectuate the transfer of the remaining digital assets from the cold wallet:

- Step 1. Go to a service provider such as MyEtherWallet. <https://www.myetherwallet.com/>
- Step 2: Click on "Access My Wallet".
- Step 3: Click on "Software: Keystore Files, Mnemonic Phrase, Private Key"
- Step 4: Click on "Private Key"
- Step 5: Enter the Private Key in the field, check "accept terms", click "Access Wallet".

At this point the wallet is entered and transferring of tokens can occur.



For the above additional reasons, this Court should deny Plaintiff's instant application, in its entirety.

Thank you in advance for your attention in this matter.

Respectfully submitted,

/nlp/
Neil L. Postrygacz, Esq.

Attorneys for Defendant LeBeau